

Shoreham Cement Works Area Action Plan Issues & Options

Summary of Responses

Chapter 4: The Five Areas of Shoreham Cement Works

There were a total of 104 responses to this chapter. These consisted of 7 general comments on the chapter and 97 responses to the question.

There were a total of 7 comments on this chapter. These are summarised below.

National Agencies

The **Environment Agency (EA)** commented that; (1) a minimum 10 metre buffer zone is required between the River Adur and any development (incl. play equipment and lighting); and (2) the steel sheet piles that hold up and retain the banks (and cycle/footpath above) are in poor condition. The EA further explained that the buffer zones are required to allow a river to be more resilient to pollutants and the impacts of climate change, as well as providing valuable habitats and ecological corridors. Finally, the EA stated that the delivery and retention of the buffer zones would need to be conditioned as part of any potential future planning permission.

District, Borough, City and County Councils

Hampshire County Council (HCC) explained that the Riverside is low lying and part will be within the flood plain in the future. As such, HCC questioned whether the Riverside would be suitable for anything other than “low key” development. HCC explained that the Riverside may offer opportunities to increase biodiversity, flood storage capacity, green space for informal recreation, low key visitor and outdoor sports activities, and nature enhancements. In terms of the Bowl, HCC questioned the potential for lightweight commercial buildings given the area’s landscape sensitivity. Instead, HCC recommended that the Bowl could be conserved and used for informal and less intensive recreation. Finally, HCC concurred with the recommendations for the Clifflands, but suggested that the Moonscape should be used for nature enhancements as per the recommendations of the Landscape Study.

Parish and Town Councils

Henfield Parish Council (HPC) commented that their committee had no strong views on the relative merits of the four development scenarios, except that they favoured keeping the Riverside for the development of low rise leisure facilities (to maintain views), and favoured using the Cement Works for industrial and/or housing development.

Other Organisations

The **Shoreham District Ornithological Society** stated that the Riverside is highly valuable habitat for numerous birds, especially Common Sandpipers, Kingfishers, Grey Wagtails, and wintering thrushes such as Redwings and Fieldfares. The Riverside is the only section of the Lower Adur bordered by trees and shrubs. The tree belt and shrubs (esp. those lying on both sides of the Downs Link) provide a shelterbelt that screen the river and the adjacent floodplain from activity likely to disturb birds. In addition, the trees and shrubs provide screening, food, nesting, perching and roosting sites for numerous bird species (incl. Common Sandpipers and Kingfishers); and the low-lying cliff face of the riverbank provides important roosting sites for the Common Sandpiper at high tide. The Society were concerned that any proposal to enhance water-based leisure access

Shoreham Cement Works Area Action Plan Issues & Options

Summary of Responses

would impact existing bird habitats (esp. Common Sandpiper roosts) and, instead, suggested that the Riverside should incorporate areas of valuable and sensitive bird habitat.

The **Sussex Ornithological Society** strongly opposed built development (esp. three and four storeys) between the A283 and the River Adur, and cited the waterside development at Shoreham as being “totally unacceptable”. Instead, the Society wanted to see vegetation enhancements between the Downs Link and the River Adur, and the creation of a “green screen” for birds using the river and river valley. The Society highlighted the presence of Common Sandpipers and Kingfishers (both amber listed, and the latter Schedule 1) who use the mud and over-hanging vegetation for roosting and hunting.

The **Sussex Wildlife Trust** explained that the five areas of the site offer different opportunities for nature recovery. For example, the Riverside could be conserved and enhanced as a riparian corridor linking with other habitats down and up stream. The Trust were concerned that “intense” development at the Riverside may be damaging to both the site and, more broadly, the Lower Adur. The bend of the river has thick vegetation and provides a location where Sussex Ornithological data has shown that Common Sandpipers and King Fishers have been recorded. In addition, the site falls within the impact risk zone of the Adur Estuary SSSI which underwent a rapid condition assessment in 2021 and is classified as “unfavourable declining”. Therefore, an increase in, and encouraging more, access to the river could further contribute to pressures at this location. Impacts to Mill Hill to New Timber SSSI and the Mill Hill LNR from activities would also require careful assessment. The Trust further commented that the other four areas of the site all have value and the potential to deliver important areas for biodiversity. In particular, the Clifflands to the bare surfaces in the Moonscape present habitat opportunities for invertebrates and open mosaic habitat. Finally, the Trust commented that the PEA indicates that further biodiversity information should be gathered to fully understand the impacts of the proposal(s). The Trust concluded that nature is looking to thrive in the absence of intense human activity.

Individuals

No general comments were received by individuals in relation to Chapter 4.

Question 8: Should the redevelopment hide, frame or reveal new views moving eastwards away from the main road or a combination of all three?

There were a total of 97 responses. These are summarised below.

District, Borough, City and County Councils

Adur & Worthing District Council (AWDC) commented that SCW forms a prominent position within the South Downs, and is located at the narrowest point of the National Park. Although AWDC accepted that new development is likely to generate direct and indirect effects on the landscape, the council commented that any harm would have to be outweighed by demonstrating that the redevelopment is in the public interest as per Paragraph 177 of the National Planning Policy Framework (NPPF). AWDC explained that the Riverside is part of Local Landscape Character Area (LLAC) 1a (Shoreham Cements Works West of A283) and is within AWDC’s administrative boundary. LLAC 1a is a topographically flat landscape which has a moderate-to-high landscape sensitivity value when assessed against the “Views & Visual Amenity” criteria in the Landscape Sensitivity Evaluation. However, the overall sensitivity of LLAC 1a has been assessed as

Shoreham Cement Works Area Action Plan Issues & Options

Summary of Responses

low-to-moderate for mixed-use development. This is due to its poor condition and urban/industrial character, despite its prominent location along the course of the River Adur and within the National Park. AWDC commented that redevelopment at this location must not be visually intrusive (esp. when viewed from the river), nor have a detrimental effect on the environment, landscape and recreational opportunities. Finally, AWDC supported the following design principles set out in the Landscape Report, in that development should:

- Respond to both sensitive views and character to design unobtrusive buildings and rooflines (variety in built form and visual breaks in the roofspace would be appropriate);
- Be cognisant of views into the LLAC and across the River Adur and sensitive skylines;
- Not exceed the scale of existing development on site (seen in views across the river valley);
- Keep new development heights no greater than existing and below the horizon line of Beeding Hill; and
- Be unobtrusive in views from the west, and work in partnership with other elements of landscape (e.g., trees).

Parish and Town Councils

Findon Parish Council (FPC) commented that redevelopment should frame and reveal new views moving eastwards rather than hide them.

Kingsley Parish Council (KPC) commented that redevelopment should do whatever it can to remove the current landscape scarring, and open up the view of the South Downs and the river estuary.

Upper Beeding Parish Council (UBPC) believed that new artistic and innovative structures should be revealed rather than hidden. The parish council commented that a new development should provide a combination of all three aspects (i.e., hide, frame and reveal), and suggested that the main building could be maintained with new buildings added to it to enhance the site.

Other Organisations

The **Greening Steyning Group** thought that there could be an opportunity to combine all three. However, this would need to be done with considerable care to maintain and improve wildlife habitats and avoid the removal of trees wherever possible.

The **SDNPA Design Team** thought that the redevelopment should maximise the experience of views, and create a procession of views.

The **Sussex Campaign to Protect Rural England (CPRE)** commented that the “starkness” and “majesty” of the chalk cliffs are seen on the Downs where chalk has previously been extracted. The Campaign stated that the height of the chalk walls at SCW should be visible from the road with, perhaps, the chimney retained to help with visual scale.

Individuals

There were a number of duplicate responses, and some individuals did not directly answer the question. In terms of the latter, these individuals either reiterated their responses to previous Chapters and Questions (and these have been captured in the appropriate Chapter / Question summaries as much as possible), or stated that the site should be left alone to re-wild and/or

Shoreham Cement Works Area Action Plan Issues & Options

Summary of Responses

contribute to biodiversity net gain (BNG) and nature recovery. Of those individuals who did directly respond to the question, a summary of their responses is below:

- 19 individuals favoured a combination of all three (i.e., hide, frame, and reveal);
- 17 individuals favoured “Reveal”;
- 11 individuals favoured “hide”;
- 12 individuals either did not appear to favour an option or were not sure;
- 7 individuals favoured “Frame” and “Reveal”, but not “Hide”;
- 4 individuals favoured “Frame”;
- 2 individuals stated that they did not like or understand the question;
- 2 individuals stated that the site should change as little as possible or remain the same;
- 1 individual favoured “Frame” and “Hide”, but not “Reveal”; and
- 1 individual stated that development should stay below the cliff height.

It must be stressed that numerous individuals caveated their responses by stating that their answer depended on the final design, location, quantum and use of development.